

APR 3 0 2004 RESP

# Environmental Protection Omaha, NE

April 28, 2004

Mr. Kenneth V. Herstowski, P.E.
USEPA
RCRA Corrective Action & Permits Branch
Air, RCRA and Toxics Division
901 North 5<sup>th</sup> Street
Kansas City, KS 66101

Dear Mr. Herstowski:

Please refer to the Administrative Order on Consent (the Order) for the Omaha, Nebraska Shops of the Union Pacific Railroad Company. More specifically, the site is described as  $9^{\rm th}$  and Cass Streets, Omaha, Nebraska, RCRA I.D. No. NED000829754.

Per Paragraph 35.d. in Section VII, Work To Be Performed, of the Order, I am hereby transmitting to you three copies of the draft Corrective Measures Completion Report Operable Unit No. 1. The report was prepared by URS and is dated April 2004. Please review the draft report and provide me with your comments for incorporation into the final report.

If you wish to discuss any aspect of the work please contact me at (402) 271-3675 or at jmcdermo@up.com.

Yours truly,

Jeffrey D. McDermott, P.E.

Mgr. Environmental Site Remediation

R00404802 RCRA RECORDS CENTER **Environmental Management Group** 

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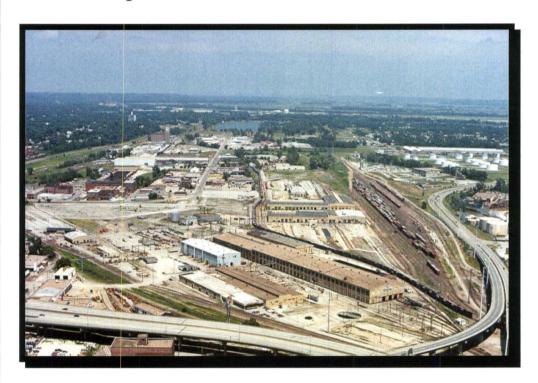
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# CORRECTIVE MEASURES COMPLETION REPORT OPERABLE UNIT NO. 1 (OU1)

Omaha Shops



Prepared for Union Pacific Railroad Company Omaha, Nebraska



April 2004



### CORRECTIVE MEASURES COMPLETION REPORT OPERABLE UNIT NO. 1

### UNION PACIFIC RAILROAD OMAHA SHOPS

Union Pacific Railroad Company 1416 Dodge Street Omaha, Nebraska 68179

### **CERTIFICATION**

"I certify that this document and all attachments hereto were prepared under my direction or supervision. To the best of my knowledge, information and belief, the information submitted is true, accurate and complete. I am aware that there are criminal penalties for knowingly providing false information."

Name: Jeffrey D. McDermott

Title: Mgr. Environmental Site Remediation

Date: 04/28/2004

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Appendix A Inspection Reports

**CFR** Code of Federal Regulations

**CMC** Corrective Measures Completion

**CMI** Corrective Measures Implementation

**CMS** Corrective Measures Study

mg/kg milligrams per kilogram (parts per million)

**NDEQ** Nebraska Department of Environmental Quality

Operation and Maintenance O&M

Order Administrative Order on Consent

OU1 Operable Unit No. 1

**RCRA** Resource Conservation and Recovery Act

**RFI** RCRA Facility Investigation

**UPRR** Union Pacific Railroad Company

**URSGWC** URS Greiner Woodward Clyde

**URS URS** Corporation

USEPA U.S. Environmental Protection Agency

W-C Woodward-Clyde Consultants

#### 1.1 UPRR OMAHA SHOPS LOCATION AND BACKGROUND INFORMATION

The Union Pacific Railroad (UPRR) Omaha Shops are located at 9th and Webster Streets in Omaha, Nebraska (North 41°15' 58" latitude, West 95° 55' 40" longitude). The legal description of the facility is Township 15 North, Range 13 East, Section 22. The Omaha Shops encompass approximately 184 acres located north of downtown Omaha, just west of the Missouri River in the Missouri River floodplain (Figure 1-1)

The Omaha Shops included various buildings and production support areas, each having a function in past operations of the facility. The Omaha Shops were in operation for approximately 100 years, with principal functions as a railroad fueling facility, repair shop, paint shop, and car body repair shop for UPRR's locomotive and car fleet.

UPRR used steam engines from the 1860s until the mid-1950s. The original steam engines were fueled by burning wood, coal, fuel oil, and petroleum-based fuel. In the mid-1950s, diesel power became the predominant source of power for train locomotives. During that time, the entire facility was converted from handling steam engines to diesel engines.

From the 1950s to 1988, the site was a major overhaul and maintenance facility for UPRR. In 1988, most of the operations, except the print shop and the car shop, moved to Little Rock, Arkansas. After the operations were moved in 1988, facility demolition began. Specific operations history for Operable Unit 1 (OU1) is presented in the Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) Report (URSGWC 1999).

The Omaha Shops are the subject of a United States Environmental Protection Agency (USEPA) Administrative Order on Consent (Order) under Section 3008(h) of RCRA. The Order requires UPRR to complete a Corrective Measure at OU1. The OU1 site includes the surface soils above the normal high water table within the portion of the Omaha Shops that has been acquired by the City of Omaha for the development of a public-use building project (Figure 1-2).

#### 1.2 **PURPOSE**

The purpose of this Corrective Measure Completion (CMC) Report is to present information that documents how the corrective measure objectives and corrective measure completion criteria have been satisfied for OU1. The information presented in this report provides justification to cease the corrective measure monitoring.

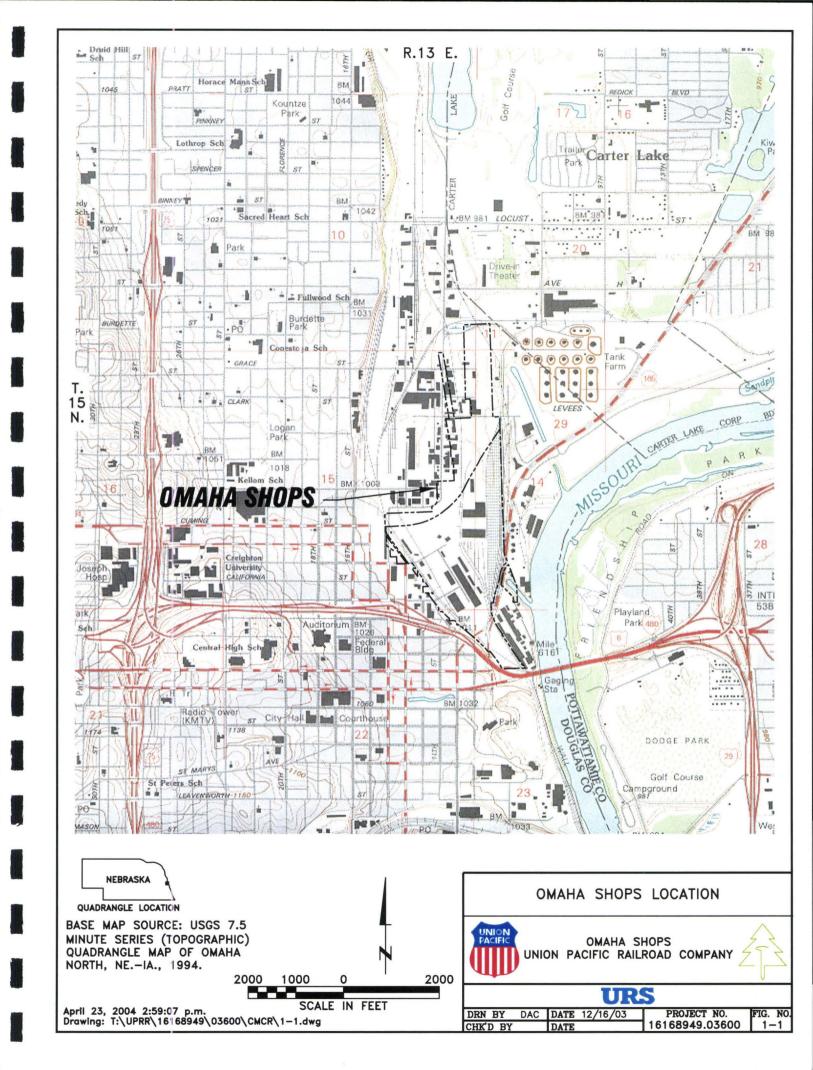
#### 1.3 REPORT ORGANIZATION

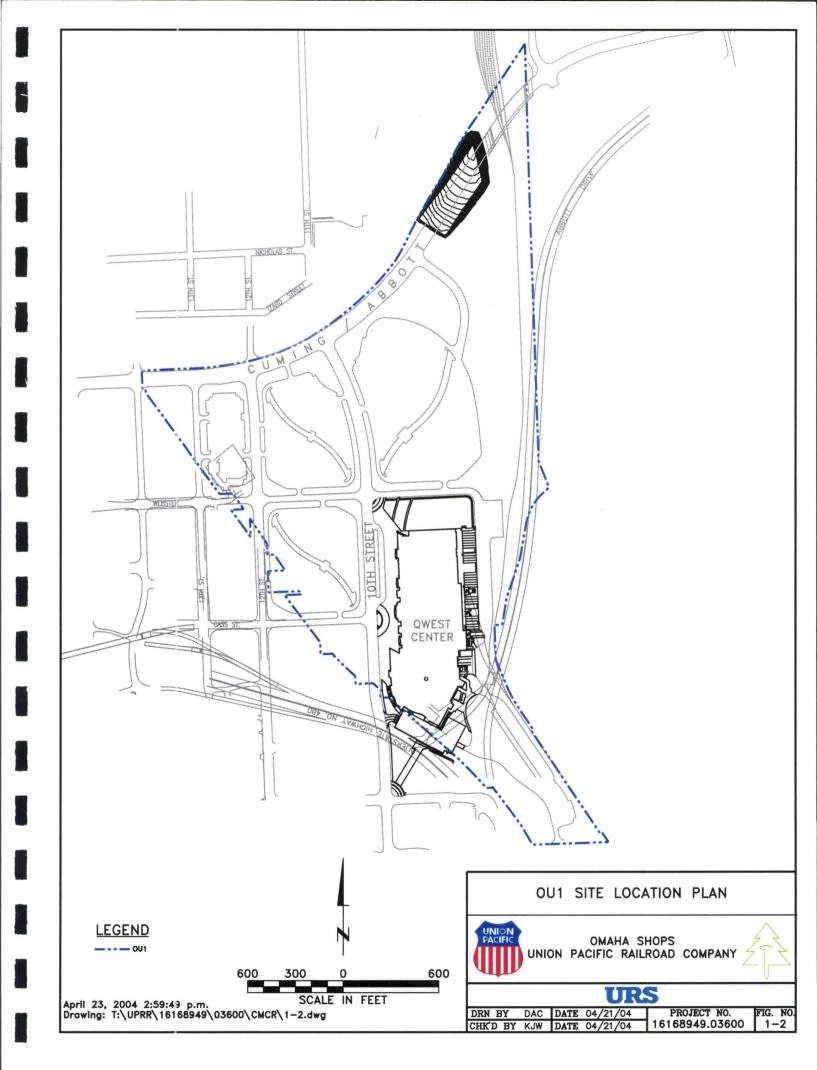
This report is organized into the following sections:

Section 1 - Introduction and Purpose: Describes the UPRR Omaha Shops, purpose of the CMC Report, and report organization.

Section 2 – Corrective Measure Synopsis: Provides an overview of the corrective measure.

- Section 3 -- Corrective Measure Completion Criteria: Discusses the process and criteria for determining when the corrective measure and the maintenance and monitoring may cease.
- Section 4 -- Summary of Corrective Measure Completion: Discusses the results of the testing and monitoring during the corrective measure and compares the corrective measure confirmatory results to the corrective measure completion criteria.
- Section 5 -- Summary of Work Accomplishments: Describes the performance levels achieved, the volumes removed and disposed, and the nature and final disposition of the waste.
- Section 6 Summary of Significant Activities: Discusses the major activities and any significant problems.
- Section 7 Summary of Inspections: Discusses the findings of the periodic inspections.
- Section 8 Summary of Costs: Provides the costs to complete the monitoring and maintenance portion of the corrective measure.
- Section 9 Post O&M Contingency Procedures: Describes the procedures for doing invasive work in the embankment.
- Section 10 References.





Surface and shallow soils within OU1 were found to contain lead at levels above the corrective measure objective. The corrective measure at OU1 was implemented to focus on the exposure setting for which protection will be provided. The exposure setting took into account the chemical of potential concern, media of concern, and exposure pathways. The excavation limits encompass the area of contaminated soil found by drilling and soil sampling during the RFI. The corrective measure objectives for OU1 are:

- To reduce the potential for the current occupants, future construction workers, and recreational users to be exposed to site surface and shallow soils with lead levels in excess of 1,218 mg/kg
- To reduce the potential for future construction workers performing intrusive work to come into contact with subsurface soils containing lead in excess of the levels mentioned above
- To ensure the objectives mentioned above are still met after completion of future construction work

#### 2.1 CORRECTIVE MEASURE SUMMARY

The corrective measure, excavation and on-site disposal, consisted of excavating the top 12 inches of site soils in areas that contain greater than 1,218 milligrams per kilogram (mg/kg) of lead except in the area under the proposed Abbott Drive/Cuming Street road embankment. Soils remaining above 1,218 mg/kg during confirmation sampling were excavated below 12 inches to achieve corrective action objectives. The contaminated soil was placed in the Abbott Drive/Cuming Street road embankment.

Drilling and soil sampling information was used to determine the excavation limits. Confirmation soil sampling was collected from the excavation for laboratory analysis to confirm that performance standards had been achieved. The frequency of sampling and testing are detailed in the CMI Work Plan (URS 2000). Final excavation limits were based on achieving performance standards.

The contaminated soils were excavated using standard earthwork equipment capable of excavating to the required depths. Any sewers or other buried utilities that were encountered during excavation were temporarily supported or relocated as necessary to maintain service. Railroad tracks, bridge piers, light poles and all other structures were protected with minimum clearances from excavation. All monitoring wells located within the excavation limits were abandoned by a licensed water well contractor in accordance with Nebraska Title 178.

#### 2.2 CONSTRUCTION SUMMARY

Excavation of Phase I lead impacted soil began with construction of a ramp over the 16-inch water main and concrete removal in the embankment area in June 2000. The excavation of one foot of lead impacted soil was completed in the first portion of the Phase I soils and nine confirmation samples were collected from the excavation on June 21, 2000. Analytical results indicated the southernmost and the northernmost samples exceeded the clean-up criteria of 1,218 mg/kg. Excavation of an additional foot of material from these areas and additional confirmation

samples were collected in July 2000. Analytical results from these confirmation samples indicated that the Phase I soil excavation was below 1,218 mg/kg.

Placement of the temporary winter cover was halted pending the City of Omaha's decision to relocate the Abbott Drive/Cuming Street embankment on August 11, 2000.

A portion of the Phase II lead impacted soil excavation was started to facilitate construction of the new Coal Track along the east property boundary in August 2000. This portion of the project was originally scheduled to take place in the spring of 2001, but old track removal completed ahead of schedule allowed this portion of the work to be completed. Excavation of the first foot of Phase II lead impacted soil in the southwest portion of the project was completed in October 2000. This excavation consisted of three distinct areas and one confirmation sample was collected from each section. The middle section was confirmed "clean" by analytical results in October 2000. The east section was confirmed "clean" by analytical results in November 2000. The west section was confirmed "clean" by analytical results in December 2000. Subsequently, this finished all of the corrective measures work for 2000.

Relocation of the Abbott Drive/Cuming Street embankment was started on April 2, 2001. Prior to moving the embankment, approximately 5,000 cubic yards of asbestos contaminated soils were placed into the northern toe of the new embankment location. The soils were placed with approval from both the USEPA and the Nebraska Department of Environmental Quality (NDEQ). Following relocation of the embankment, the remaining Phase II soils were excavated and placed in the relocated embankment. Relocation of the embankment was completed and confirmation samples were collected from the soil beneath the old embankment in April 2001. Analytical results confirmed that the soils below the old embankment location were below 1,218 mg/kg on May 1, 2001.

Excavation of the remaining Phase II soils were completed and three confirmatory samples were collected on May 2, 2001. Analytical results confirmed that the remaining soils were below 1,218 mg/kg. Subsequently, the clean soil cover on the embankment was started. Placement of the clean soil cover was completed on May 18, 2001, marking the completion of the OU1 Corrective Measure.

This section describes the process and methods for determining when the completion criteria have been met. The corrective measure achieved the corrective measure objectives once the excavation, placement, and covering of the contaminated soils, installation of the pavement, and embankment seeding was completed. In accordance with the Operation and Maintenance Plan, the maintenance and monitoring will cease at the conclusion of one year of monitoring following the placement of the embankment seeding. The following methods were used to document the corrective measure and verify its successful completion.

#### 3.1 VISUAL OBSERVATION

During the implementation of the corrective measure, the site was continuously monitored to verify that the soils from within the excavation limits were removed to the proposed depths and placed in the Abbott Drive/Cuming Street embankment.

#### 3.2 **CONFIRMATION SOIL SAMPLING**

After the excavation was completed to the proposed limits, confirmation soil samples were collected to verify that excavation activities removed all of the lead-contaminated soil above the 1,218 mg/kg concentration. Each confirmation sample consisted of a 5-point composite sample collected within an approximate 250-foot by 200-foot sampling grid (approximately 50,000 square feet). The composite samples were analyzed for total lead using Method 6010. The confirmation sampling locations were chosen to best represent the lead-contaminated excavation In areas where the confirmation samples indicated that contamination in excess of the 1,218 mg/kg was still present, additional soils were excavated and confirmatory samples were recollected.

#### 3.3 OPERATION AND MAINTENANCE REQUIREMENTS

Operation and maintenance (O&M) of the corrective measure began immediately after completion of the corrective measure in accordance with the O&M Plan. The purpose of the O&M is to maintain the integrity of the remediated areas. The O&M requirements included the following:

- Periodic inspections to ensure the cover has not been disturbed, eroded, or otherwise compromised
- Repairs to the cover, as necessary, resulting from erosion, burrowing animals, unauthorized traffic or other damage

## **SECTION**FOUR

### **Summary of the Corrective Measure Completion**

This section demonstrates how the corrective measure objectives were met and describes the work completed to satisfy the corrective measure objectives. As described in the O&M Plan, the completion criteria was satisfied upon the completion of the roadway pavement, embankment seeding, and one year of site monitoring following the placement of seed.

#### 4.1 ANALYTICAL RESULTS

The corrective measure objectives were met for OU1 when the excavation of the lead contaminated soils was complete and all confirmatory results indicated that no soil containing greater than 1,218 mg/kg lead remained.

A total of 29 confirmation samples were collected and analyzed for total lead by Method 6010. The results of the analysis are included in Table 4-1 and the locations of the confirmatory samples are shown on Figure 4-1. The concentrations of the confirmation samples ranged from 35 mg/kg to 1,140 mg/kg, indicating that the soil remaining in place satisfies the corrective measure objective of less than 1,218 mg/kg of lead in soil.

#### 4.2 ROAD PAVEMENT PLACEMENT AND EMBANKMENT SEEDING

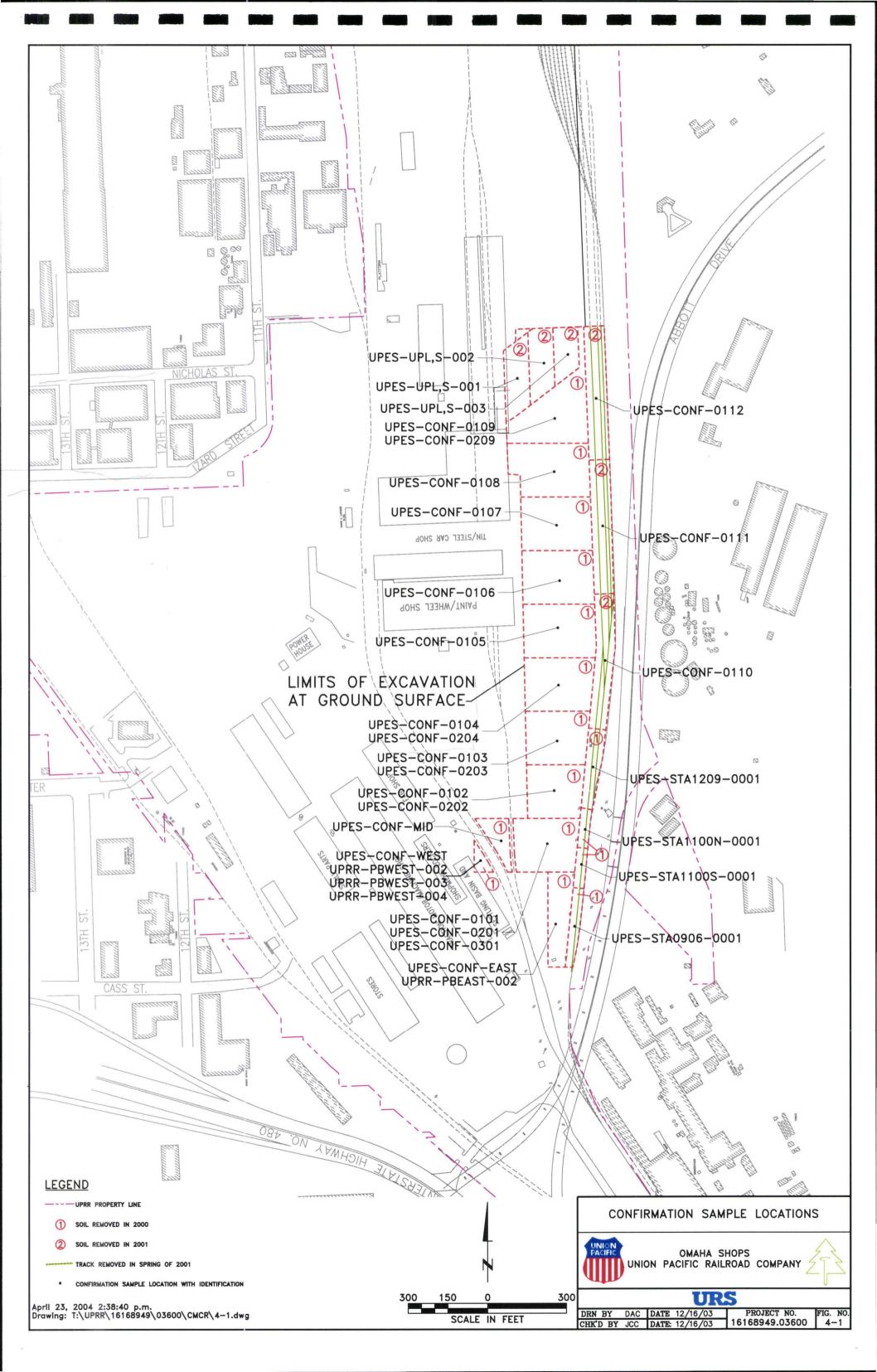
The Abbott Drive/Cuming Street overpass pavement is complete and open to traffic. The embankment was seeded in the summer and fall of 2002.

#### 4.3 **POST SEEDING O&M**

The site has been inspected semiannually (spring and fall) since 2001, including 1.5 years of inspections since the final placement of the embankment seedbed.

TABLE 4-1 SUMMARY OF CONFIRMATORY SOIL ANALYTICAL RESULTS OU1 LEAD CORRECTIVE MEASURE OMAHA SHOPS - OMAHA, NE

	Concentration		
Sample Identification	(mg/kg)	Date	Comments
UPES-CONF-0105	780	6/22/2000	
UPES-CONF-0106	940	6/22/2000	
UPES-CONF-0107	580	6/22/2000	
UPES-CONF-0108	1100	6/22/2000	
UPES-CONF-0202	790	7/19/2000	Second confirmation sample collected from this area. Two feet of soil excavated.
UPES-CONF-0203	417	7/19/2000	Second confirmation sample collected from this area. Two feet of soil excavated.
UPES-CONF-0204	736	7/19/2000	Second confirmation sample collected from this area. Two feet of soil excavated.
UPES-CONF-0209	416	7/19/2000	Second confirmation sample collected from this area. Two feet of soil excavated.
UPES-CONF-0301	31.7	7/31/2000	Third confirmation sample collected from this area. Three feet of soil excavated.
<b>UPES-CONF-MID</b>	1140	10/19/2000	
UPRR-PBEAST-002	788	11/30/2000	Second confirmation sample collected from this area. Two feet of soil excavated.
UPRR-PBWEST-004	104	12/13/2000	Fourth confirmation sample collected from this area. Four feet of soil excavated.
UPRR-UPL,S-001	220	4/27/2001	Original embankment location, west third.
UPRR-UPL,S-002	280	4/27/2001	Original embankment location, middle third.
UPRR-UPL,S-003	110	4/27/2001	Original embankment location, east third.
UPES-CONF-0110	37	5/2/2001	
UPES-CONF-0111	35	5/2/2001	
UPES-CONF-0112	36	5/2/2001	



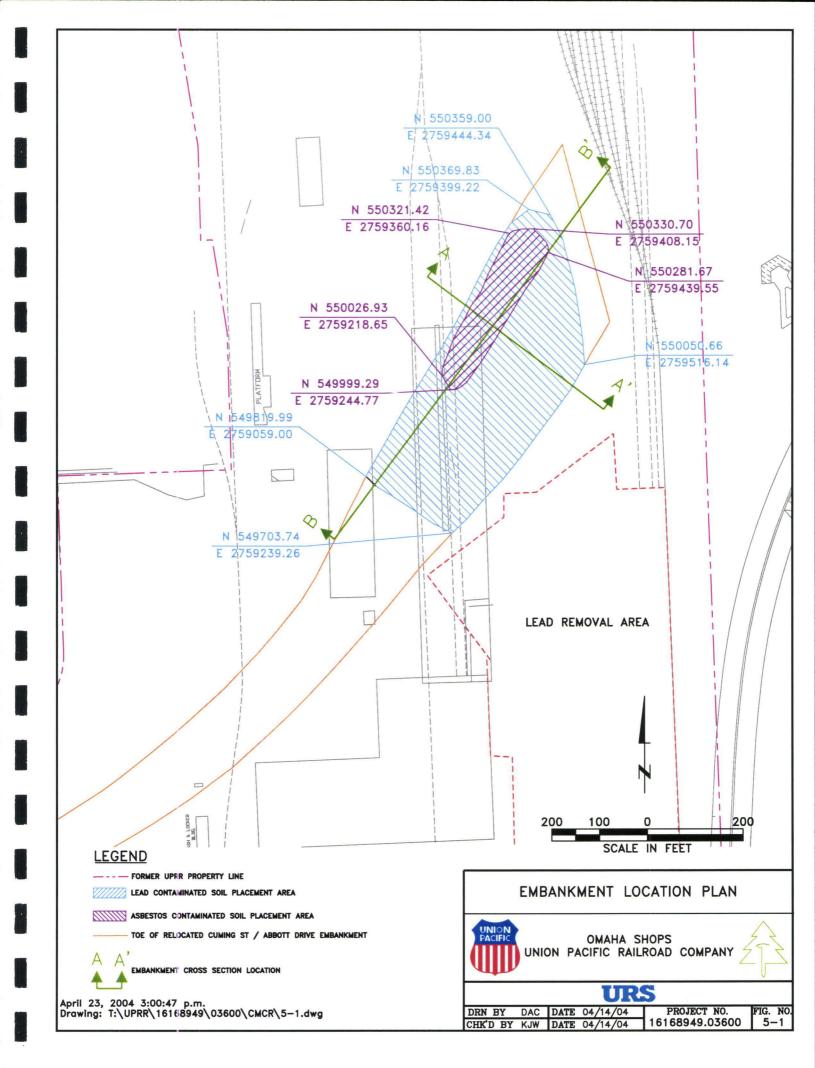
This section summarizes the work accomplishments including the performance level achieved, volume of material removed and the final disposition of the excavated material.

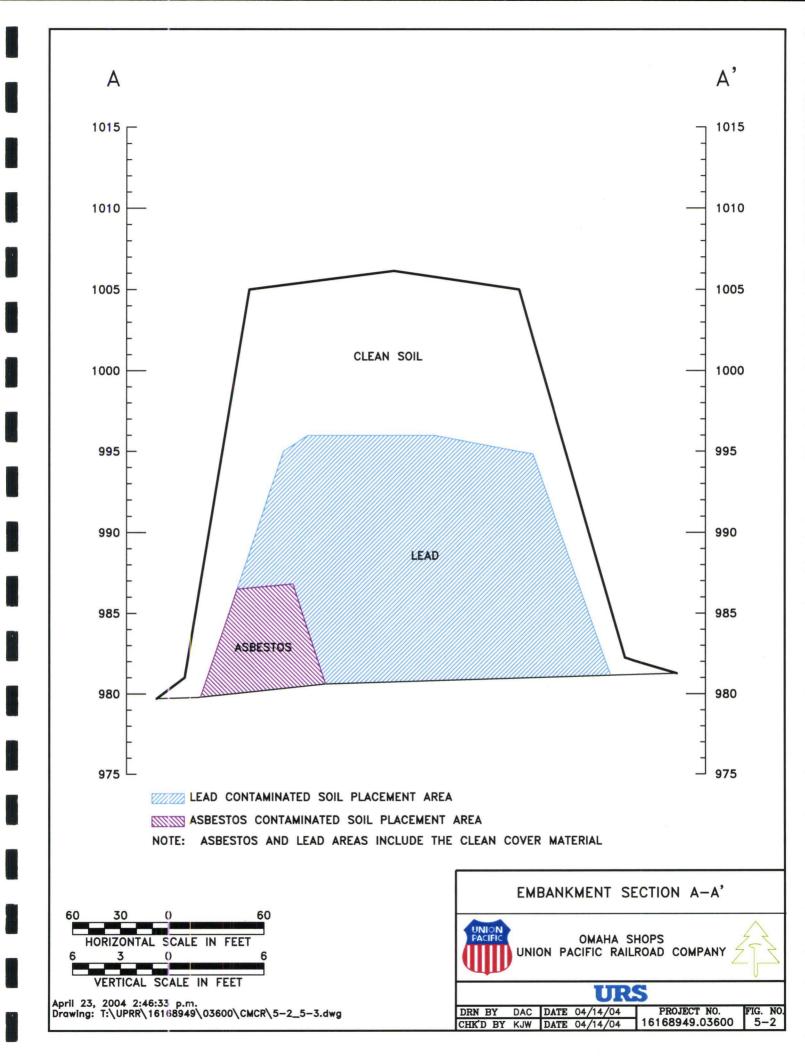
#### 5.1 PERFORMANCE LEVELS

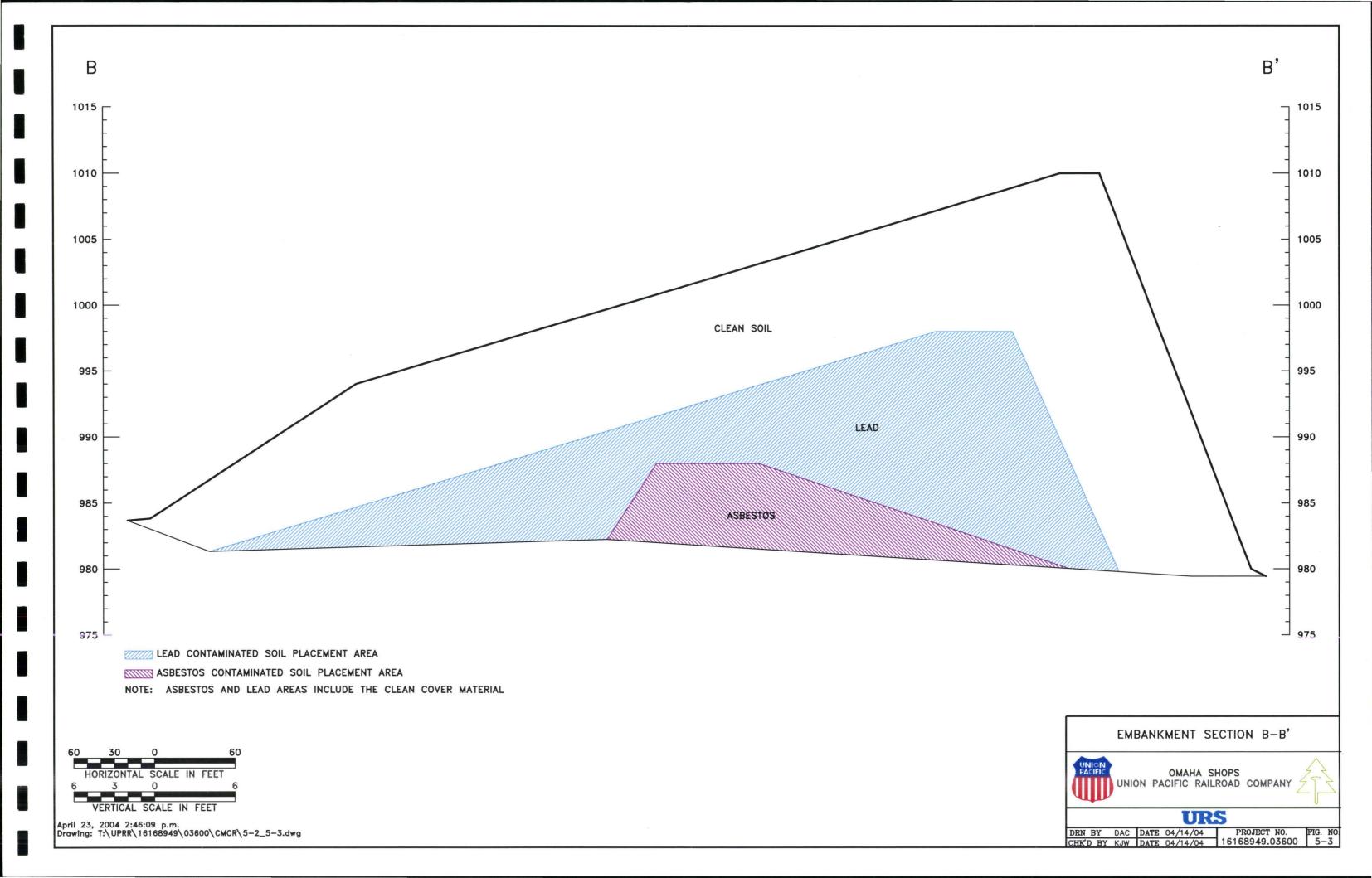
In developing the risk assessment presented in the RFI report (URSGWC 1999), it was assumed that OU1 would be developed as proposed by the City of Omaha into a convention center and arena complex. The corrective measure was designed to provide adequate protection of workers during construction activities and protection of the on-site workers and recreational users of the facility. Protection was achieved by reducing the potential for exposure to site surface and shallow soils with lead levels in excess of 1,218 mg/kg.

#### 5.2 **EXCAVATED MATERIAL VOLUME ESTIMATES AND DISPOSITION**

An estimated 45,000 cubic yards of lead contaminated soil and 5,000 cubic yards of asbestos containing soil was excavated and placed into the core of the Abbott Drive/Cuming Street embankment. An orange geo-fabric layer was placed over the top of both the lead-contaminated soil and the soil containing asbestos, followed by several feet of clean structural fill and roadway payement. Survey coordinates for the lead-contaminated soil and asbestos containing soil buried within the embankment are shown on Figure 5-1. Figures 5-2 and 5-3 show typical crosssections through the Abbott Drive/Cuming Street embankment.







The significant activities, milestones and problems included the following:

- The work was completed in two phases in order to allow UPRR to maintain rail service through the site. Due to the logistics of constructing a new rail yard and removing existing rail yard tracks, the soil beneath the existing tracks to the west was excavated in the spring of 2000, as Phase I.
- The Phase I excavation area was sampled to verify that the lead contaminated soils had been sufficiently removed in accordance with the corrective measure objectives. The results of the confirmatory soil samples indicated that the Phase I portion of the site met the corrective measures objectives in July 2000.
- A portion of Phase II was completed in the summer and fall of 2000. This excavation consisted of three distinct areas and one confirmation sample was collected from each section. The results of the confirmatory samples indicated that this portion of the Phase II met the corrective measure objectives in December 2000.
- Based upon a decision by the City of Omaha and future adjacent property development, the location of the Abbott Drive/Cuming Street embankment was moved to the north. Therefore, the lead contaminated soils that were placed into the embankment, as Phase I, were excavated and placed into the core of the new embankment location.
- Prior to moving the embankment, approximately 5,000 cubic yards of asbestos contaminated soils were placed into the northern toe of the new embankment location. The soils were placed with approval from both the USEPA and the Nebraska Department of Environmental Quality (NDEQ).
- The remainder of the Phase II work was completed in the spring of 2001. Soils beneath the old tracks that had been removed was excavated and placed into the roadway embankment. Confirmatory soil sampling of the Phase II portion of the site indicated that the site met the corrective measures objectives in June 2001.
- After excavation of the Phase I and Phase II soils and placement into the roadway embankment, the entire crest of the embankment was covered with 12 inches of clean fill and the sideslopes were covered with 36 inches of clean fill.

#### 7.1 INSPECTION

The soil cover and sideslopes have been inspected semiannually after completing the placement of the contaminated material and the cover, 1.5 years of which occurred after placement of the embankment seedbed. Each face of the embankment was visually inspected for evidence of erosion cracking, sloughing, animal burrows, settlement, growth of undesirable vegetation or other deleterious condition that may potentially compromise the effectiveness of the cover.

#### 7.2 MAINTENANCE AND REPAIR

Erosion of the sideslopes occurred prior to completing the pavement surface and vegetating the area. Since the embankment required additional soil to achieve the required grades for the road pavement, the City of Omaha's contractor(s) repaired any erosion damage when placing additional soils.

#### 7.3 REPORTING

#### 7.3.1 Inspection Reports

Following each field inspection, a written report was prepared on behalf of UPRR. Each report summarizes the findings of the inspection and is included in Appendix A.

### Maintenance and Repair

There was not any maintenance or repair work done by UPRR, therefore no maintenance and repair reports were completed.

#### 7.4 RECOMMENDATIONS

The corrective measure objectives were achieved once the excavation, placement, and covering of the contaminated soils, installation of the pavement, and embankment seeding were completed. In accordance with the Operation and Maintenance Plan, monitoring of the embankment lasted for 1.5 years rather than 1 year due to construction schedules. Based on the activities completed and the information presented in this report, the corrective measure objectives and corrective measure completion criteria have been satisfied for OU1 and provide justification to cease the corrective measure monitoring.

## **SECTION**EIGHT

### **Summary of 0&M Costs**

The costs to complete the O&M were limited to the labor required to complete each site inspection of the embankment and complete the inspection form. For the purposes of this section assume that each site inspection, including travel and office time, took about four hours. A total of six inspections at an estimated labor rate of \$90 per hour cost about \$2,160 to complete the O&M phase of the corrective measure.



The following procedures will be followed associated with future activities at the Abbott Drive/Cuming Street road embankment:

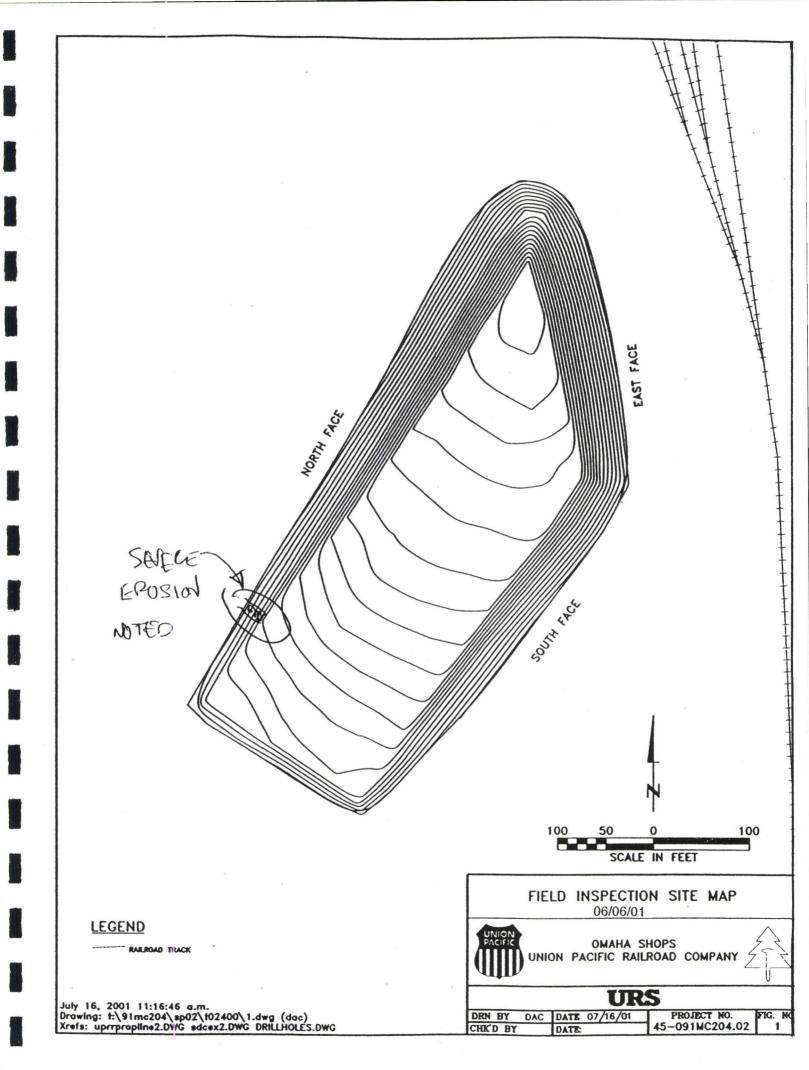
- UPRR must be notified in writing a minimum of twenty (20) business days prior to the start of any intrusive activity.
- The details of the intrusive activity must be provided to UPRR, including the schedule of the intrusive work, type and depth of the intrusive activity, and planned repair or abandonment procedures for the activity. UPRR will notify the USEPA of the proposed activities.
- If problems occur during the intrusive activity requiring changes to the original embankment and soil cover design, the planned changes will be clearly noted on a site plan and the rationale for the design change and necessary actions required to repair or complete the corrective measure will be documented. All planned changes must be sent to UPRR. UPRR will notify the USEPA of the proposed design changes before the changes are implemented. If significant design changes are required, the proposed work may be temporarily stopped until USEPA approval is granted.
- If the intrusive activity extends below the orange geo-fabric used to cover and mark the asbestos- and lead-contaminated soil piles, then the soil disturbed below the fabric must be returned to its original location in the same order as it was removed and must not leave the site. In addition, the identifying orange geo-fabric must be repaired or replaced, the extent of the disturbed location surveyed by a licensed surveyor, and clean backfill material placed. The disturbed area surface will be returned to its original condition including protection from soil erosion and the surface completion will match the original surface (i.e., grass, pavement, etc.).
- The survey information and a Completion Report documenting all aspects of the intrusive activity must be sent to UPRR within 20 days of work completion.

In the event of a major or complete failure of the soil cover, the USEPA will be verbally notified within 24 hours of the event and will receive written notice of the event within 72 hours of the event. The written notice will include the specifics of the event, what response action is being taken or is planned, and any potential impacts on human health or the environment.

- Woodward-Clyde (W-C). 1995. Phase II Site Assessment, Construction Area, Omaha Shops. Omaha, Nebraska. December.
- Woodward-Clyde (W-C). 1996. Remedial Action Plan, UPRR Omaha Shops, Omaha, Nebraska. August.
- URS Greiner Woodward Clyde (URSGWC). 1999. RCRA Facilities Investigation Report, UPRR Omaha Shops, Omaha, Nebraska. June.
- URS Greiner Woodward Clyde (URSGWC). 2000. Corrective Measures Study, Operable Unit No. 1 (OU1), UPRR Omaha Shops, Omaha, Nebraska. February.
- URS Corporation (URS). 2000. Corrective Measures Implementation Work Plan, Operable Unit No. 1 (OU1), Omaha Shops. Omaha, Nebraska. July.
- URS Corporation (URS). 2001. Corrective Measures Implementation Report, Operable Unit No. 1 (OU1), Omaha Shops. Omaha, Nebraska. December.
- URS Corporation (URS). 2001. Corrective Measures Implementation Operation and Maintenance Plan, Operable Unit No. 1 (OU1), Omaha Shops. Omaha, Nebraska. October.

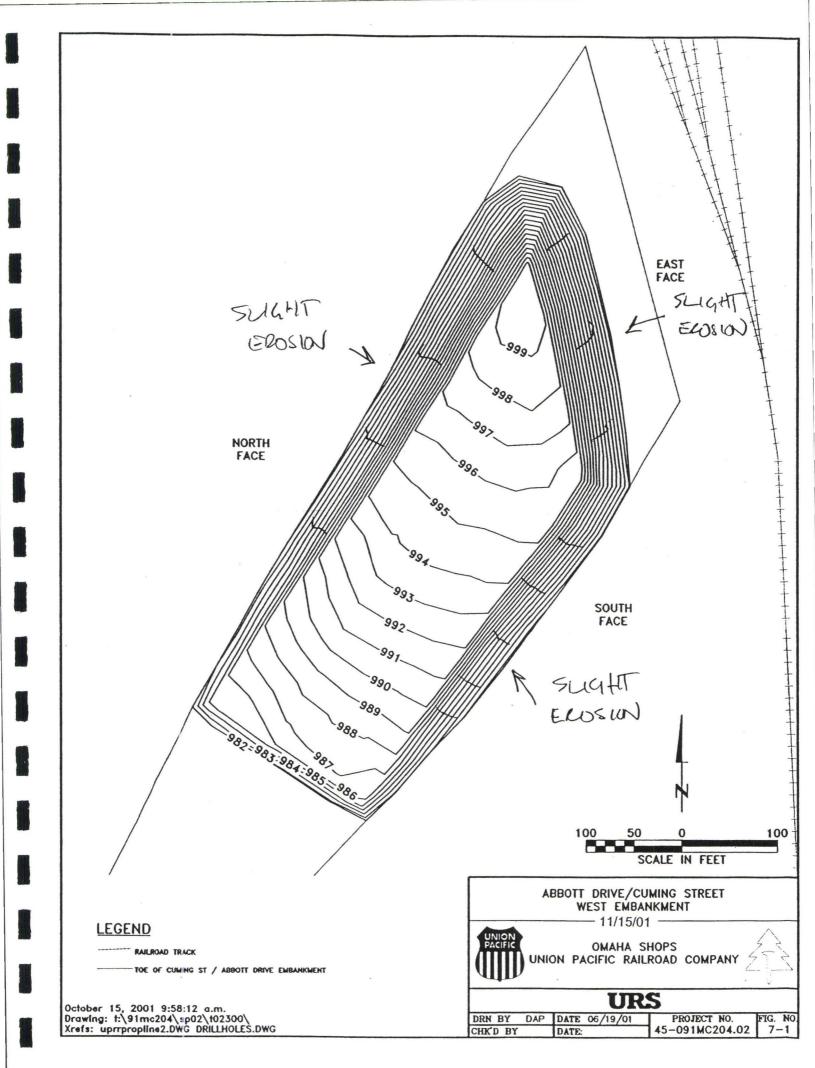
Date:	June 6, 2001			Weather: 75°F, Sunny
Tanastad Dru	CDD			Designation TAC
Inspected By:	CRP			Reviewer: JAS
	ITEM	YES*	NO	COMMENTS/RECOMMENDED MAINTENANCE
	n - North Face			
Visible Settleme	ent		X	
Ponding			X	
Topsoil Erosion		N/A		Topsoil not in place
Loss of Vegetat		N/A		
Animal or Rode			X	
Other (Identify)		X	The second second	Extreme erosion (down to fabric) on west end
Cover System				
Visible Settleme	ent		X	
Ponding			X	
Topsoil Erosion		N/A		
Loss of Vegetat		N/A		
Animal or Rode			X	
Other (Identify)			X	
	ı - South Face			
Visible Settleme	ent		X	
Ponding			X	
Topsoil Erosion		N/A		
Loss of Vegetat		N/A		
Animal or Rode			X	
Other (Identify)			X	
				ns (Attach Additional Pages if Necessary)
Repair of erodeo	area on North Face nee	ded. Se	e Fig	gure for location.
	<b>.</b>			
	•			

 $<sup>\</sup>mbox{\ensuremath{*}}$  - For all items with a "YES" response, show location on an attached site map.



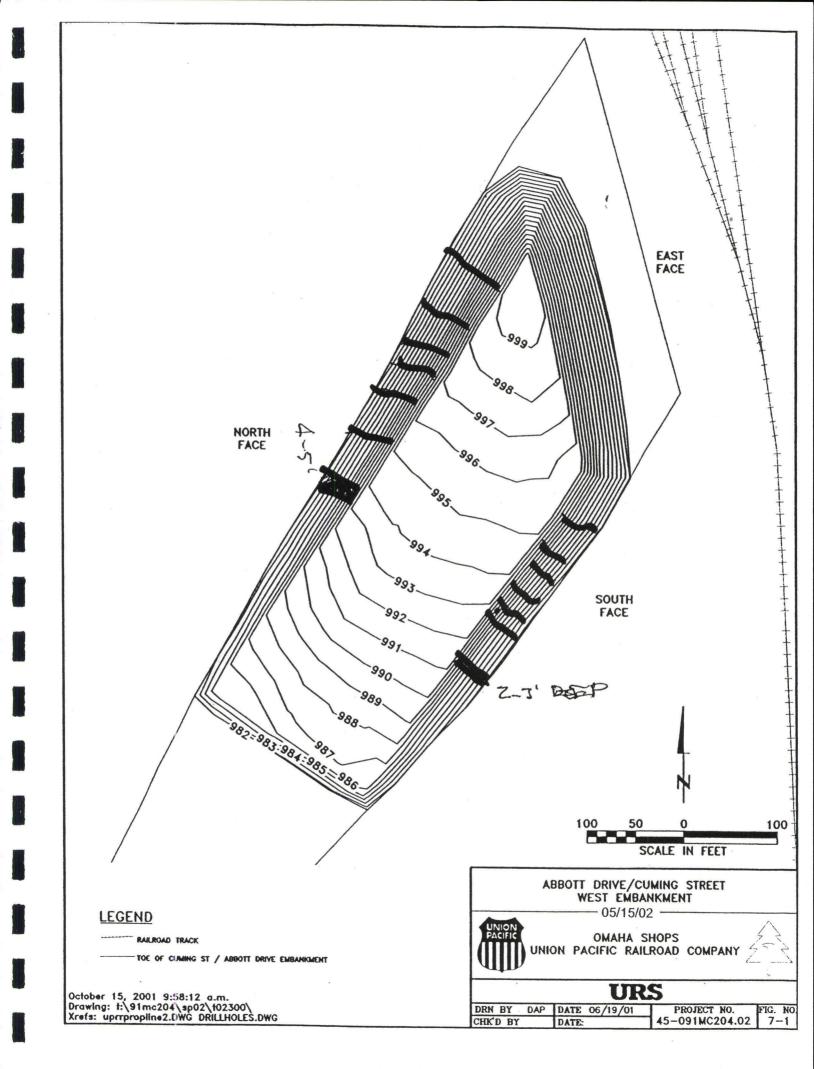
Date:	November 15, 2001		_	Weather: 70°F, P. Cloudy
Inspected By:	CRP			Reviewer: JAS
				,
	ITEM	YES*	NO	COMMENTS/RECOMMENDED MAINTENANCE
Cover System	n - North Face			
Visible Settlem	ent		X	
Ponding			X	
Topsoil Erosion	1	N/A		Topsoil not in place
Loss of Vegetat	ion		X	
Animal or Rode	ent Burrows		X	
Other (Identify)		X		Slight erosion on cover, see below
Cover System	ı - East Face	1		
Visible Settlem	ent		X	
Ponding			X	
Topsoil Erosion		N/A		
Loss of Vegetat	ion		X	
Animal or Rode	ent Burrows		X	
Other (Identify)		X		See above
Cover System	1 - South Face			
Visible Settleme	ent		X	
Ponding			X	
Topsoil Erosion	L	N/A		
Loss of Vegetat	•		X	
Animal or Rode	ent Burrows		X	
Other (Identify)		X		See above
Addit	ional Comments or C	bserv	atio	ns (Attach Additional Pages if Necessary)
Very minimal e	rosion from storm runof	f, City h	as pl	aced additional fill.
	•			
Erosion has not	impacted original protec	ctive co	ver.	
	,			
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 $<sup>\</sup>mbox{\ensuremath{*}}$  - For all items with a "YES" response, show location on an attached site map.



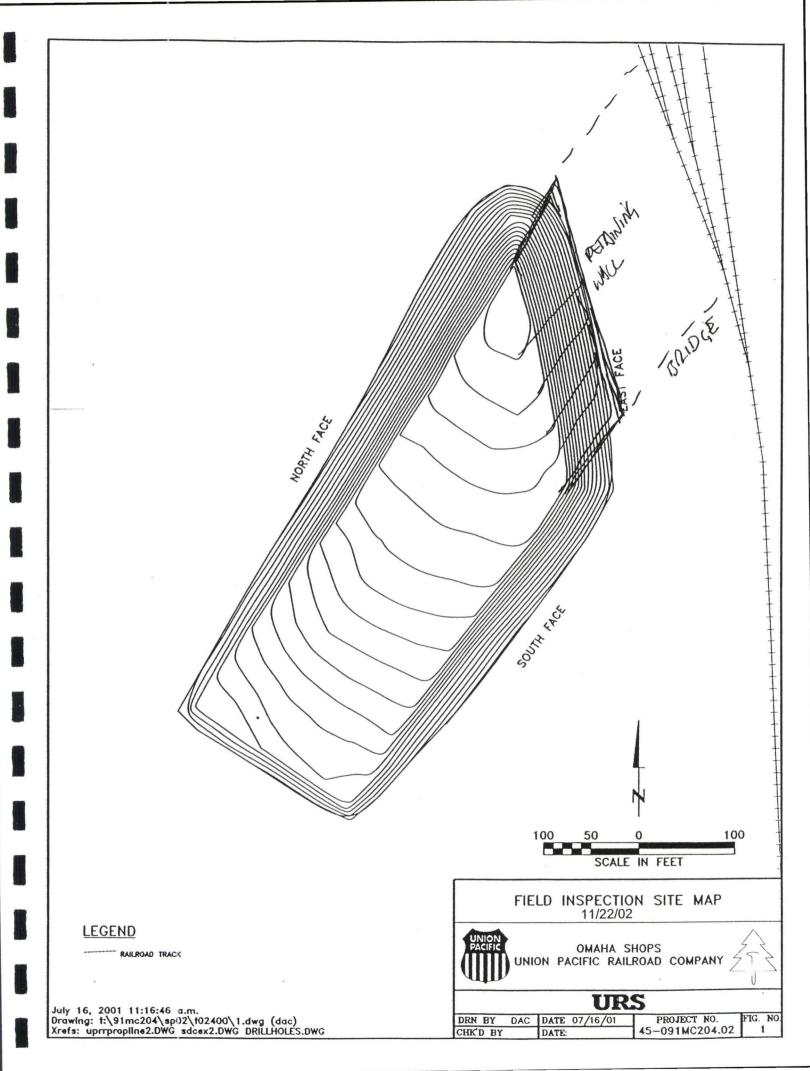
Date:	May 15, 2002			Weather: 60°F, Sunny/P. Cloudy
Inspected By:	CRP			Reviewer: JAS
	ITEM	YES*	NO	COMMENTS/RECOMMENDED MAINTENANCE
		and the same of th		
	n - North Face			
Visible Settlem	ent		X	
Ponding			X	
Topsoil Erosion		N/A		Topsoil not in place
Loss of Vegetat			X	
Animal or Rode			X	
Other (Identify)		X		4 to 5 foot deep furrows in fill
Cover System			North All	Bridge abutment in place
Visible Settlem	ent	N/A		
Ponding		N/A		
Topsoil Erosion		N/A		
Loss of Vegetat		N/A		
Animal or Rode		N/A		
Other (Identify)		N/A		
	1 - South Face			
Visible Settlem	ent		X	
Ponding			X	
Topsoil Erosion		N/A		See above
Loss of Vegetat			X	
Animal or Rode	ent Burrows		X	
Other (Identify)		X		2 to 3 foot deep furrows in fill
Addit	tional Comments or C	Observ	atio	ns (Attach Additional Pages if Necessary)
Approximately	15 feet of additional fill	has bee	n pla	ced on embankment since May 2001.
Furrowing from	rain does not encroach	on prote	ective	cover.

 $<sup>\</sup>boldsymbol{*}$  - For all items with a "YES" response, show location on an attached site map.



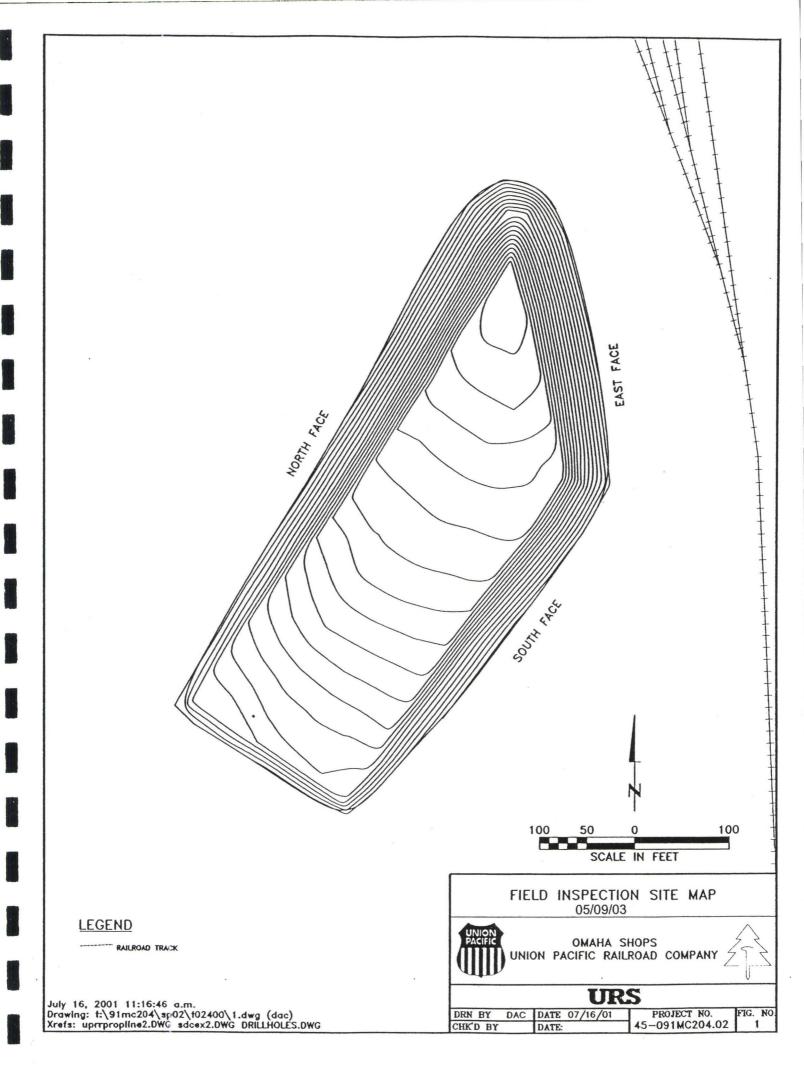
Date:	November 22, 2002			Weather:	55°F, Sunny
Inspected By:	CRP			Reviewer:	JAS
	ITEM	VEC*	NO	COMME	NTC/DECOMMENDED MAINTENANCE
L	ITEM	YES*	NO	COMME	NTS/RECOMMENDED MAINTENANCE
Cover System	n - North Face				
Visible Settlem		SHE MALINE PROPERTY.	X		
Ponding			X		
Topsoil Erosion	1		X		
Loss of Vegeta			$\overline{}$	Vegetation	mat/hay has been added by City
Animal or Rod			X		, ,
Other (Identify)			X		
the same of the sa	n - East Face				
Visible Settlem		N/A			
Ponding		N/A			
Topsoil Erosion	1	N/A			
Loss of Vegeta		N/A			
Animal or Rode	ent Burrows	N/A			
Other (Identify)	)	N/A			
Cover System	n - South Face				
Visible Settlem	ent		X		
Ponding			X		*
Topsoil Erosion	a		X		
Loss of Vegetar	tion		X	See above	
Animal or Rode	ent Burrows		X		
Other (Identify)			X		
Addi	tional Comments or	Observ	ation	ns (Attach	Additional Pages if Necessary)
	-				
I					

<sup>\* -</sup> For all items with a "YES" response, show location on an attached site map.



Date:	May 9, 2003		-	Weather:	60°F, Breezy, Sunny
Inspected By:	CRP		_	Reviewer:	JAS
L	ITEM	YES*	NO	СОММЕ	ENTS/RECOMMENDED MAINTENANCE
Cover System	n - North Face				
Visible Settlem		Constitution of the Consti	X		
Ponding			X		
Topsoil Erosion	1		X		1
Loss of Vegetal			X		2)
Animal or Rode			X		
Other (Identify)	а.				
Cover System				N/A Bridge	e Embankment Retaining Wall In Place
Visible Settlem		200000000000000000000000000000000000000			
Ponding					
Topsoil Erosion	l				
Loss of Vegetat					
Animal or Rode					
Other (Identify)	,				
Cover System	n - South Face				
Visible Settlem		150000000000000000000000000000000000000	X		
Ponding			X		
Topsoil Erosion			X		
Loss of Vegetat			X		
Animal or Rode			X		
Other (Identify)					
the second secon	the state of the s	Observ	ation	s (Attach	Additional Pages if Necessary)
	established on emban				
	Roadway is open to tr				
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<sup>\* -</sup> For all items with a "YES" response, show location on an attached site map.



Date:	November 21, 2003		_	Weather: 40 F, wind 15 mph, party cloudy
Inspected By:	Brian Osborn		-	Reviewer:
	ITEM	YES*	NO	COMMENTS/RECOMMENDED MAINTENANCE
Cover System	n - North Face			
Visible Settlem	ent		X	
Ponding			X	
Topsoil Erosion	1	X		Minor erosion channels
Loss of Vegeta	ion	X		Vegetation cover <50%
Animal or Rode	ent Burrows	X		One animal burrow noticed
Other (Identify)				
Cover System	n - East Face			
Visible Settlem	ent		X	
Ponding			X	
Topsoil Erosion	l	X		Several erosion channels on north side of concrete
Loss of Vegetat	ion	X		Vegetation is sparse near erosion channels
Animal or Rode	ent Burrows		X	
Other (Identify)				
Cover Systen	n - South Face			
Visible Settlem			X	
Ponding			X	
Topsoil Erosion		X		Four erosion channels
Loss of Vegetat		X		Some bare spots along east end, near erosion channels
Animal or Rode	ent Burrows		X	
Other (Identify)				
Addit	ional Comments or C	bserv	ation	ns (Attach Additional Pages if Necessary)
North side of en	nbankment is less than 5	0% veg	etate	d but erosion is minor. South side is fully vegetated
				ce has several erosion channels, up to 6-inches
				reas, specificially adjacent to concrete area.
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<sup>\* -</sup> For all items with a "YES" response, show location on an attached site map.

